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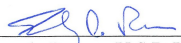
MEMO ENDORSED

October 12, 2022

Via ECF:

The Honorable Edgardo Ramos, U.S.D.J.
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Plaintiff's request is denied. Plaintiff may renew the request for an informal discovery conference if the outstanding discovery is not produced by the parties' agreed-upon date (October 17, 2022). So ordered.


Edgardo Ramos, U.S.D.J.
Dated: **October 14, 2022**
New York, New York

Re: *Gonzalez v. Hanover Ventures Marketplace LLC et al*
Case No. 21-cv-01347 (ER)

Dear Judge Ramos:

We are counsel to Plaintiff. We write to inform the Court of a discovery dispute and request either (i) an informal conference under Local Civil Rule 37.2 and Your Honor's Individual Rules and Practices in Civil Cases, Section 2(A) or (ii) an Order for the production of outstanding class sampling and collective discovery by October 17, 2022.

Plaintiff has compelled a sampling of 25% of class documents in the past. Most recently on August 9, 2022, the Court issued an Order mooted Plaintiff's motion to compel as Defendants agreed to produce outstanding discovery. To date none of this class sampling has been provided. Parties have had multiple meet and confers and granted extensions as to this production. Defendants now assure us that production will occur by October 17, 2022. To ensure production without need of any further extensions, Plaintiff is requesting that the Court order this outstanding material be produced by Monday, October 17, 2022.

Additionally, Plaintiff has requested discovery and responses as to Opt-in Plaintiffs. Specifically, as to these Opt-Ins Plaintiffs, the following is agreed upon, but remains outstanding:

1. Defendants have not provided formal responses to Opt-in Plaintiff's discovery demands;
2. Of the 38 Opt-in Plaintiffs, Defendants have not provided any documents as to (i) Saxon Baird or (ii) Aviva Goldstein;
3. Defendants have not produced any time records for any of the Opt-in Plaintiffs; and
4. Defendants have only produced paystubs of 13 of the Opt-in Plaintiffs. Of these 13 opt-ins, 9 have no production of personnel file, wage notices or notice of receipt of handbook.

Once again, Defendants assure us that production will occur by October 17, 2022. To ensure production without need of any further extensions, Plaintiff is requesting that the Court order this outstanding discovery be produced by Monday, October 17, 2022, as well.

We thank the Court for its time and consideration.

Respectfully submitted,

C.K. Lee
C.K. Lee, Esq.